

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

DISTRICT OF NH
FILED

FRANK STAPLES and KATHLEEN BUSSIÈRE,
Plaintiffs,
v.
GOVERNOR CHRISTOPHER T. SUNUNU, et al.,
Defendants.

2025 MAR 24 P 8:16
24 HOUR DEPOSITORY

Civil Action No.: 1:24-cv-00331-LM-TSM

NOTICE OF FILING WITNESS LIST (REDACTED AND UNREDACTED VERSIONS)

NOW COME the Plaintiffs, Frank Staples and Kathleen Bussiere, and hereby notify the Court that they are submitting the attached Witness List as part of their discovery record. The Witness List contains identifying information of individuals who were present and/or have direct knowledge of the events central to this litigation, including the public meetings held on September 29, 2021, October 13, 2021, and November 19, 2021. These witnesses are expected to provide testimony and/or affidavits relevant to Defendants' conduct, surveillance, venue restrictions, and the arrests forming the basis of this civil rights action.

Due to the sensitive nature of the information contained in the Witness List—including names, contact information, and potentially identifying details of third parties—Plaintiffs will be filing both redacted and unredacted versions in accordance with Local Rule 83.12 governing privacy and sealed filings. The unredacted version will be provided to the Clerk's Office under seal for in-camera review.

This filing supplements Plaintiffs' Notice of Discovery Requests, submitted to the Court and emailed to Defendants' counsel on March 20, 2025.

Plaintiffs will deposit the accompanying Notice of Filing Witness List into the Court's after-hours drop box on the evening of March 24, 2025, and will formally file both versions (redacted and unredacted) with the Clerk's Office the following morning, Tuesday, March 25, 2025.

Additional witness affidavits relevant to the September 29 and November 19, 2021 incidents are currently being coordinated and will be submitted as they become available.

Respectfully submitted,

/s/ Frank Staples (Electronic Signature)
332 Merrimack Street



Manchester, NH 03103
(603) 722-5408
Absolutedefiance@protonmail.com

/s/ Kathleen Bussiere (Electronic Signature)
178 S. Main Street, Apt 3
Newton, NH 03858
(603) 770-2015
kaffatina@yahoo.com

Dated: March 24, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this March 24, 2025, a true and correct copy of the foregoing Plaintiffs' Notice of Discovery Requests, along with Exhibit A, was filed electronically via the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Frank Staples (Electronic Signature)
332 Merrimack Street
Manchester, NH 03103
(603) 722-5408
Absolutedefiance@protonmail.com

A handwritten signature in black ink, appearing to read 'Frank Staples', with a stylized flourish extending from the end.

/s/ Kathleen Bussiere (Electronic Signature)
178 S. Main Street, Apt 3
Newton, NH 03858
(603) 770-2015
kaffatina@yahoo.com

Dated: March 24, 2025